



FARM

Farm Animal Reform Movement

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Re. FDA's Egg Safety Plan (Docket No. 00N-0504)

We request that FDA revise its Egg Safety Plan to address unsanitary and inhumane farming practices which lead to egg contamination. Specifically, we request that FDA's plan include a ban on the practice of forced molting of laying flocks.

FARM is a nonprofit organization representing over 17,000 members in the US. Our mission is to promote sustainable, humane farming practices through grassroots outreach campaigns.

FDA's Egg Safety Plan fails to address the cause of egg contamination: unsanitary and inhumane farming practices. Conventionally raised egg-laying hens live in overcrowded, filthy buildings. They are subjected to stress-inducing practices such as forced molting and artificial lighting schedules, which increase their susceptibility to Salmonella infection. According to the US Department of Agriculture, "[E]xtended starvation and water deprivation practices lead to increased shedding of Salmonella enteritidis (Se) by laying hens subjected to these practices" (Stolfa, August 21, 1998). USDA also states there is epidemiological evidence which associates [forced] molting with higher prevalence of SE in flocks.

FDA's Egg Safety Plan must address practices on the farm which have been conclusively linked to egg contamination if consumers are to be adequately protected.

We appreciate this opportunity to submit comments regarding FDA's Egg Safety Plan.

Sincerely,


Lucy Goodrum, Esq.
Research Director

00N-0504

254